IN THE
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK-BROOKLYN

United States of America,	)	
	)	
	)	
	)	**Case: 1:15-cr-00252-PKC-RML-16**
v.	)	
	)	
Webb et. al.,	)	
	)	
______________________________	)	

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT ARIEL ALVARADO

Pursuant to Rule 1.2 of the Local Criminal Rules of the United States District Court for the Eastern District of New York, counsel for Ariel Alvarado, the Defendant, Attorney Jeremy Iandolo hereby request the Court to allow him to withdrawal as the counsel of record. The Court should grant this motion because it will not adversely affect the proceedings of this case and neither party will be unduly prejudiced by counsel's withdrawal. In support the undersigned counsel states the following:

1. To the best of my knowledge, the Defendant resides in the Republic of

Panama and has not been physically present in the United States since the commencement of these criminal proceedings.

2. The Defendant, Ariel Alvarado, has failed to respond to any and all of the undersigned counsel's several communication attempts regarding matters pertaining to the present case.
3. The lack of communication and involvement by the Defendant in the case before this Court prevents me, as his counsel, to effectively represent him and comply with my professional obligations.
4. According to news articles of local newspapers of the Republic of Panama, on April 21, 2017, Ariel Alvarado was detained and incarcerated in the Republic of Panama pursuant to an arrest warrant issued by the Sixth Anticorruption Prosecutor's Office of the Public Ministry of the Republic of Panama.
5. This Motion is being made in good faith and not for purposes of delaying these proceedings.

WHEREFORE, I, Jeremy Iandolo, for reasons stated supra, respectfully request this Honorable Court to remove me as the counsel of record for Ariel Alvarado, the Defendant, in the above entitled case.

Respectfully submitted, this 4th day of May, 2017.

/s/ Jeremy M. Iandolo
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Counsel for Defendant

CERTIFICATE OF FILING AND SERVICE

I, Jeremy M. Iandolo, hereby certify that on May 4, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to all the registered CM/ECF users.

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